



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE DIDI GLOBAL INC. SECURITIES
LITIGATION

Master Docket
21-cv-05807 (LAK)

This document applies to: All actions

SCHEDULING ORDER

LEWIS A. KAPLAN, *District Judge*.

It is hereby ORDERED that the following schedule shall govern pre-trial proceedings:

1. **Initial Disclosures.** Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall be served by May 3, 2024.
2. **Answers.** Defendants' Answers must be filed by May 3, 2024.
3. **Amended pleadings and additional parties.** Plaintiffs may amend the complaint or join additional parties with Defendants' consent or with the Court's leave.
4. **Class Certification.**
 - a. Plaintiffs' motion for class certification shall be filed by January 6, 2025.
 - b. Plaintiffs shall complete production of documents in response to Defendants' requests relevant to Plaintiffs' motion for class certification motion, and make available for deposition any expert who submitted a report in support of such motion, no later than 15 days prior to Defendants' deadline to oppose Plaintiffs' class certification motion.
 - c. Defendants' response to Plaintiffs' motion for class certification shall be filed within 30 days following filing of the motion for class certification.
 - d. Plaintiffs shall obtain documents from Defendants, depose any expert(s) related to any expert declarations, reports, and/or analyses included in Defendants' response to Plaintiffs' motion for class certification within 30 days of Defendants response to Plaintiffs motion for class certification.

- e. Plaintiffs' reply in further support of their motion for class certification shall be filed within 30 days of Defendants' response to their motion for class certification.

5. **Fact Discovery.**

- a. Initial requests for production of documents shall be served by May 22, 2024.
- b. All requests for production of documents must be served no later than 60 days prior to the date of the close of fact discovery.
- c. Documents, as defined in Fed. R. Civ. P. 34(a)(1)(A) and S.D.N.Y. Local Rule 26.3, shall be produced on a rolling basis. Privilege logs shall also be served on a rolling basis.
- d. All requests to admit must be served no later than 30 days before the end date of fact discovery.
- e. Deadlines for fact discovery.
 - Production of documents in response to initial requests for production of documents must be substantially completed by September 23, 2024.
 - Production of documents in response to initial requests for production of documents requests must be completed no later than October 23, 2024.
 - The Parties will complete all discovery, other than expert discovery, no later than April 1, 2025.

6. **Electronic Discovery and Confidentiality**

- a. On April 5, 2024, Plaintiffs circulated to all parties a draft stipulation and proposed order concerning the protocol for discovery of electronically stored information (the "ESI Protocol").
- b. On April 5, 2024, Plaintiffs circulated to all parties a draft stipulation and proposed protective order concerning confidentiality (the "Protective Order").
- c. On May 1, 2024, Defendants sent their collective comments on the draft ESI Protocol and Protective Order to Plaintiffs.
- d. The parties shall file the ESI Protocol and Protective Order no later than May 31, 2024.

7. **Obligation to Supplement.** Supplemental disclosures under Fed. R. Civ. P. 26(e) shall be made promptly after the receipt of information by the party or counsel and, in any event,

no later than the completion of fact discovery, unless good reason can be shown for why such information was not available.

8. Expert Discovery.

- a. Every party-proponent of a claim or affirmative defense that intends to offer expert testimony in respect of such claim or affirmative defense must make the disclosures required by Fed. R. Civ. P. 26(a)(2) on or before May 1, 2025.
- b. Every party-opponent of such claim or affirmative defense that intends to offer expert testimony in opposition to such claim or affirmative defense must make the disclosures required by Fed. R. Civ. P. 26(a)(2) on or before May 30, 2025.
- c. Reply expert reports must be served within 21 days of the submission of the party-opponent expert disclosure.
- d. Expert depositions shall be completed no later than September 5, 2025.

9. Dispositive Motions, Joint Pretrial Order, and Certain Other Submissions

- a. The following shall be filed no later than July 1, 2025:
 - Dispositive motions.
 - A Joint Pretrial Order prepared in accordance with the Court's Individual Rules of Practice.
- b. *Daubert* motions shall be filed no later than September 19, 2025.

10. Other Matters. The Court shall provide further instructions with respect to submission of other pre-trial and trial materials at a later date.

SO ORDERED.

Dated: May 29, 2024


Lewis A. Kaplan
United States District Judge